



ALASKA
Bering Sea Crabbers

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March 25, 2016

Mr. Glenn Merrill
Assistant Regional Administrator
Sustainable Fisheries Division, Alaska Region NMFS
PO Box 21668
Juneau, Alaska 99802-1668

Attention: Ms. Patsy Bearden

OMB Control No. 0648-0518- Alaska Crab Economic Data Report (EDR) Comment

Dear Mr. Merrill,

Alaska Bering Sea Crabbers (ABSC) is a seafood industry trade association representing roughly 70% of the harvest sector participants in the Bering Sea/Aleutian Islands (BSAI) crab fishery. As you know, our organization has been very involved in the North Pacific Fishery Management Council process over the years and many of our members were integral to the development of the Crab Rationalization (CR) program over a decade ago. More specifically, we have been full participants in the ongoing discussion regarding the Crab Catcher Vessel Economic Data Report (EDR's). Several years ago our organization convened an internal working group to focus on EDR's. This working group consists of not only vessel owners and managers, but also many of the accountants and bookkeepers that actually "keep the books" and fill out the EDR's on behalf of their clients. As such, this letter reflects the collective expertise of many people who are intimately involved in the EDR process in any given year. As such, we wish to comment on this information collection effort, pursuant to OMB Control No. 0648-0518. Please note that in our discussion with Ms. Bearden she notes an interest in receiving comment on three specific issues: *public utility of the information collected, clarity of instructions, & accuracy of the time estimates*. We will address each issue separately.

Public Utility of the Information Collected

As you know, the Crab Rationalization program marked a significant change in the management of the BSAI crab fishery. As a publicly owned resource it is clearly the responsibility of managers at the state and Federal level to understand how this change impacts the resource, crab-dependent coastal communities, harvesters, processors, and other stakeholders. Based on that rationale, the EDR program collected economic data for several years pre-Rationalization and has continued to collect data each year in the post-Rationalization period. While the working relationship has been strained at times, the harvest sector remains committed to working with NMFS to ensure that data is collected in the most efficient and least burdensome manner possible, while at the same time providing meaningful information upon which to base management decisions. As long as the data

continues to be collected with these objectives in mind, we believe it has great public utility.

Clarity of Instructions

In general we feel the instructions are fairly clear.

Accuracy of Time Estimates

We would note that the estimated time for response of 10 hours per response is a significant underestimate. The Catcher Vessel EDR form notes this estimate includes *"the time for reviewing the instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information."* We would estimate the true time per response is closer to 20-25 hours over the course of a year. In the case of an EDR submission that is subject to an audit, we would estimate an additional 10 hours.

We appreciate the opportunity to comment. Please feel free to contact me at the information below if you have any questions, comments, or need additional information.

Sincerely,



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